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*Attorneys for Sonos, Inc.*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,  
SAN FRANCISCO DIVISION

SONOS, INC.,  
Plaintiff and Counter-defendant,  
v.  
GOOGLE LLC,  
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA  
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT  
ROBERTS IN SUPPORT OF SONOS,  
INC.'S ADMINISTRATIVE MOTION  
TO FILE UNDER SEAL RE SONOS'S  
MOTION *IN LIMINE* NO. 4**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do  
2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel  
4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good  
5 standing of the Bar of the State of California. I make this declaration based on my personal  
6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set  
7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under  
9 Seal in connection with Sonos’s Motion *in Limine* No. 4 (“Sonos’s Motion”) and Google’s  
10 Response to Motion *in Limine* No. 4 (“Google’s Response”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Google’s Response	Portions highlighted in green	Sonos and Google
Exhibit 8 to Judah Declaration	Entire document	Sonos and Google

17 4. The portions of Google’s Response highlighted in green, and the exhibit listed  
18 above, contain references to Sonos’s confidential business information and trade secrets,  
19 including details of Sonos’s licensing negotiations with Google. The green-highlighted portion of  
20 Google’s response includes details from a confidential license negotiation document between  
21 Sonos and Google, and Exhibit 8 is that document. Disclosure of this information would harm  
22 Sonos’s competitive standing by giving Sonos’s competitors highly sensitive information about  
23 Sonos’s business dealings with other entities. A less restrictive alternative than sealing the  
24 portions of the Sonos’s Motion and the exhibits indicated in the table above would not be  
25 sufficient because the information sought to be sealed is Sonos’s confidential business  
26 information and trade secrets and is cited by Google.  
27  
28

1 I declare under penalty of perjury that the foregoing is true and correct to the best of my  
2 knowledge. Executed this 25th day of April, 2023 in Belevedere, California.

3  
4 /s/ Clement S. Roberts

Clement Seth Roberts  
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